

Region 2 LCR File Review

March 11, 2016

Data File Reviews are part of the regional oversight and program verification process. The regional staff will be trained to perform this function as soon as possible. Region 2 has two leads to perform the primary team lead function, and other staff will provide manpower or technical expertise required to successfully meet the audit's goals. Due to limited staff, funding and training, this activity is not sustainable by Region 2.

- Data File Review Manual will be followed as prescribed by HQ
 - Scheduled training by HQ is on hold due to the Flint situation
 - Need to get this completed as soon as possible
 - Manual is on the DWGWPS Share Point in the Region 2 system
 - Be consistent with regulations, rules, policy, guidance and directives from HQ
 - Specific rules may require additional steps or processing as new criteria or technology is developed
 - HQ to provide guidance
 - Secure funding and upgrades as necessary
 - LCR specific Modifications: Region 2- 238 PWS identified by HQ with ALEs (76 were identified as having 2 recent consecutive < 15 ppb)
 - EPA's program implementation questionnaire to the primacy states
 - Sampling plans
 - QA/QC plan
 - Sampling methods
 - Sampling equipment
 - WQPM
 - Public Education
 - Public Notification
 - Consecutive system
 - Different treatments in a consecutive system
 - Blending issue
 - Different WQPM due to multiple suppliers
 - Review all Pb samples, not just PB90%
 - All of the above will be incorporated into the usual data file review
 - Approach our ALE clusters as our priority
 - Some counties may have 12 or more ALEs- will address these first since we have limited resources and these present an opportunity to give us a geographic view of potential problems
 - We will address the others with fewer ALE- combine counties adjacent to achieve the most efficient use of resources and time
 - Approximate time frame to complete the above for NJ-49, NJ-99, and PR-19
 - CWD identified 6 counties with a total of 55 ALEs, which would require 2 days for 12 ALEs per county to be

completed. Approximately 4 weeks of travel to complete NY; 1 week to complete NJ; **and _____ to complete PR.**

- Originally, CWD provided a Travel Plan that include 4 File Review trips for 2 to 3 days each. The additional data file reviews would require a modification to this Travel Plan and add several more trips.
- Resources - DWMIB will require at least 2 additional credential inspectors to be trained on LCR specifically.
- First anticipated travels are scheduled for March/April 2016 then in June July 2016